

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
JOHN PETEREC,

Plaintiff

-against-

NEW YORK STATE POLICE TROOPER  
HILLIARD.

Defendant.  
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**Notice of Motion for  
Summary Judgment**

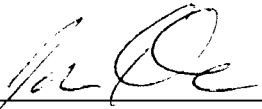
12-Civ-3944 (CS)

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law, Defendant's Statement Pursuant to Local Rule 56.1, and Declaration of John Knudsen, and all other prior pleadings and proceedings herein, the undersigned, on behalf of defendant Hilliard will move this Court, before the Honorable Cathy Seibel, United States District Judge, at the Southern District of New York, United States Courthouse, 300 Quarrapos Street, White Plains, New York, for an order pursuant to Rule 56 of the Fed.R. Civ. P. granting defendant's motion for summary judgment on the grounds that there was probable cause to initiate criminal proceedings against plaintiff, there was no post-arraignment deprivation, and that defendant is entitled to qualified immunity, and for such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that papers in response, if any, must be served by August 25, 2014 pursuant to Order of Judge Seibel.

Dated: New York, New York  
July 14, 2014

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State of New York  
Attorney for Defendant Hilliard  
By:

  
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